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7 United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 TELVIN BREAUX, aka "AJ" and "Lilcup,"
15 Defendant.
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CASE NO. 1:21-CR-00184-DAD-BAM

**STIPULATION BETWEEN THE PARTIES
REGARDING PROTECTED INFORMATION**

19 WHEREAS, the discovery in this case contains a large amount of personal information including
20 Social Security numbers, personal identification numbers, dates of birth, financial account numbers,
21 telephone numbers, and residential addresses ("Protected Information"); and

22 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
23 unauthorized disclosure or dissemination of this information to anyone not a party to the court
24 proceedings in this matter;

25 The parties agree that entry of a stipulated protective order is appropriate.

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1 THEREFORE, defendant TELVIN BREAUX, by and through his counsel of record (“Defense
2 Counsel”), and plaintiff the UNITED STATES, by and through its counsel of record, hereby agree and
3 stipulate as follows:

4 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
5 Criminal Procedure and its general supervisory authority;

6 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
7 part of discovery in this case (hereafter, collectively known as “the discovery”);

8 3. By signing this Stipulation, Defense Counsel agrees not to share any documents that
9 contain Protected Information with anyone other than Defense Counsel and designated defense
10 investigators and support staff. Defense Counsel may permit the defendant to view unredacted
11 documents in the presence of his attorney, defense investigators, and support staff. The parties agree
12 that Defense Counsel, defense investigators, and support staff shall not allow the defendant to copy
13 Protected Information contained in the discovery. The parties agree that Defense Counsel, defense
14 investigators, and support staff may provide the defendant with copies of documents from which
15 Protected Information has been redacted;

16 4. The discovery and information therein may be used only in connection with the litigation
17 of this case including exhaustion of direct and collateral appellate proceedings and for no other purpose.
18 The discovery is now and will forever remain the property of the Government. Defense Counsel will
19 return the discovery to the Government or certify that it has been destroyed at the conclusion of the case
20 including exhaustion of direct and collateral appellate proceedings;

21 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
22 ensure that it is not disclosed to third persons in violation of this agreement;

23 6. Defense Counsel shall be responsible for advising the defendant, as well as Defense
24 Counsel’s employees, other members of the defense team, and defense witnesses, of the contents of this
25 Stipulation and Order; and

26 7. In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees
27 to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound
28 by this Stipulation and Order.

1 IT IS SO STIPULATED.

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3 DATED: September 15, 2021

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5 /s/ Austin Dove
6 AUSTIN DOVE
7 COUNSEL FOR TELVIN BREAU

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9 /s/ Joseph Barton
10 JOSEPH BARTON
11 COUNSEL FOR UNITED STATES
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UNITED STATES OF AMERICA,

Plaintiff,

v.

TELVIN BREAUX, aka "AJ" and "Lilcup,"
,

Defendant.

CASE NO. 1:21-CR-00184-DAD-BAM

**PROTECTIVE ORDER BETWEEN THE
PARTIES REGARDING PROTECTED
INFORMATION**

ORDER

For good cause shown, the stipulation between counsel dated September 15, 2021, in Case No. 1:21-cr-00184-DAD-BAM, regarding discovery and treatment of Protected Information is approved.

IT IS SO ORDERED.

Dated: September 15, 2021

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE